

DOCKET FILE COPY ORIGINAL

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Allegiance Telecom, Inc.
BellSouth Corporation
DeltaCom, Inc.
GST Telecom of California, Inc.
Next Link California, LLC
Sprint Local Telephone Companies
Teleport Communications Group
WorldCom, Inc.
AT&T Corporation
GTE Service Corporation
MediaOne, Inc.
Pacific Bell
US West Communications, Inc.

Telephone Number Portability

NSD File No. L-98-20
NSD File No. L-98-27
NSD File No. L-98-24
NSD File No. L-98-21
NSD File No. L-98-26
NSD File No. L-98-22
NSD File No. L-98-23
NSD File No. L-98-25
NSD File No. L-98-28
NSD File No. L-98-29
NSD File No. L-98-30
NSD File No. L-98-31
NSD File No. L-98-32

CC Docket No. 95-116

**COMMENTS OF THE SBC COMPANIES ON PETITIONS FOR EXTENSION
OF TIME OF THE LOCAL NUMBER PORTABILITY PHASE I
IMPLEMENTATION DEADLINE**

Pursuant to the Public Notice DA 98-449 and DA 98-451 released March 4, 1998 and March 5, 1998, respectively, Southwestern Bell Telephone, Pacific Bell and Nevada Bell (the SBC Companies) file these comments responding to the Petitions for Extensions of Time of the Local Number Portability Phase I Implementation Deadline. Many CLECs have sought waiver requests because of the acknowledged problems with the NPAC in the three former Perot regions. Most all petitioners have understood the nature of the problems which required a change in NPAC provider, and no one has taken issue with the need for an extension. AT&T, however, seeks a uniform implementation date once the Lockheed Martin NPAC is live.

No. of Copies rec'd
List ABCDE

024

AT&T correctly states that the LLCs have agreed to use May 11, 1998 as the new NPAC live date, which permits inter-company testing to begin. Intercompany testing will take 30 days. However, then AT&T incorrectly assumes that carriers need only 2 weeks past that date to fully implement Phase I. AT&T reasons that "Once inter-company testing is complete, implementation of LNP should be a relatively straightforward matter." However, AT&T neglects to take into account several key issues.

First, AT&T neglects to realize the importance of a phased approach to implementation of a huge network change. The Los Angeles MSA contains 97 host switches and 17 remote switches. The second and third phases of deployment contain an additional 173 hosts and 90 remotes, all of which have been selected by CLECs for LNP deployment. A phased-in approach allows us to introduce LNP activation transactions in an organized and controlled process, and this is important given that LNP requires new processes, new hardware, software, platforms, and architecture. While we believe all of our systems and nodes are ready for LNP, the prudent way to do a network cutover of this magnitude is to perform the implementation in phases.

Second, while it may be acceptable for CLECs to accept LNP activation transactions on a more compressed basis, the FCC must realize that there are orders of magnitude differences between the implementation of LNP in the existing incumbent network and those of new entrants. Incumbents have significant number of nodes to be turned (Pacific has a total of 439 host switches serving the mandated MSAs); CLECs have far fewer. In addition, incumbents must ensure that the network and process flows of LNP work with multiple providers. All providers have deployed new provisioning and

ordering systems, and all of these systems must work together (e.g. disconnects by one provider, while new connect at a second provider). If these processes don't work properly, it will affect not only the customer who is porting their number, but also any end user trying to call that customer. While Pacific is managing the introduction of LNP in a phased approach to protect network reliability, we can foresee that customer affecting issues could result once LNP is implemented in a switch. We need to give ourselves, and the CLECs time to isolate and manage any problems which do arise.

It was for all of these reasons that the FCC initially ordered a 90 day period for implementation in each of the Phases for LNP implementation. We have attempted to compress that period in our Petition for Extension of Time in order to minimize the effect of the NPAC delay while still retaining the phased approach so that network reliability and customer service will not be compromised. The FCC should not order the compressed schedule proposed by AT&T.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE
COMPANY
PACIFIC BELL
NEVADA BELL



Nancy C. Woolf
140 New Montgomery Street, Rm. 1522A
San Francisco, California 94105
(415) 542-7657

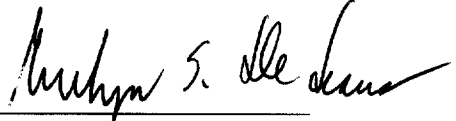
Their Attorneys

Robert M. Lynch
Durward D. Dupre
One Bell Plaza, Suite 3703
Dallas, Texas 75202
(214) 464-4244

Date: March 12, 1998
0181302.01

CERTIFICATE OF SERVICE

I, Evelyn S. De Jesus, do hereby certify that on this 12th day of March, 1998, a copy of the foregoing COMMENTS OF THE SBC COMPANIES ON PETITIONS FOR EXTENSION OF TIME OF THE LOCAL NUMBER PORTABILITY PHASE I IMPLEMENTATION DEADLINE, CC Docket No. 95-116 was sent by United States first class mail, postage prepaid, to the parties on the attached list.



Evelyn S. De Jesus

0181310.01

Richard M. Rindler
Morton J. Posner
Allegiance Telecom, Inc.
Swidler & Berlin, Chartered
3000 K Street, NW, Ste. 300
Washington, DC 20007

James H. Bolin, Jr
Mark C. Rosenblum
James H. Bolin, Jr.
AT&T Corp.
Room 3247H3
295 North Maple Avenue
Basking Ridge, NJ 07920

M. Robert Sutherland
Theodore R. Kingsley
BellSouth Corporation
Suite 1700
1155 Peachtree St., N.E.
Atlanta, GA 30309-3610

Morton J. Posner
DeltaCom, Inc.
Swidler & Berlink
3000 K Street, N.W. Ste 300
Washington, DC 20007-5116

Eric J. Branfman
Morton J. Posner
GST Telecom California, Inc.
Swidler & Berlin, Chartered
3000 K Street, N.W., Ste. 300
Washington, DC 20007

Gail L. Polivy
Richard McKenna
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Kathryn Marie Krause
MediaOne, Inc.
Suite 700
1020 19th Street, NW
Washington, DC 20036

Karen Potkul, Esq.
NextLink California, L.L.C.
1924 Deere Ave.
Santa Ana, CA 72705

Jay C. Keithley
Sprint Corporation
1850 M Street, NW, 11th Floor
Washington, DC 20036-5807

Sandra K. Williams
P.O. Box 11315
Kansas City, MO 64112

Kathryn Marie Krause
US West Communications Inc.
Suite 700
1020 19th Street, NW
Washington, DC 20036

Richard S. Whitt
Anne F. La Lena
WorldCom, Inc.
1120 Connecticut Ave., NW, Ste. 400
Washington, DC 20036

ITS
1231 20th Street, NW
Ground Floor
Washington, DC 20036

Jeannie Grimes
Common Carrier Bureau
Federal Communications Commission
Suite 235
2000 M Street, NW
Washington, DC 20554

0181307.01